

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

The Honorable Robert B.
Kugler, District Court Judge

**CERTIFICATION OF
TIFFANY M. ANDRAS, ESQ.**

I, Tiffany M. Andras, Esq., certify as follows:

1. I am an attorney with the law firm Greenberg Traurig, LLP, and am an attorney of record in the above-captioned litigation representing Defendants Teva Pharmaceuticals USA, Inc., Teva Pharmaceutical Industries Ltd., Actavis LLC, and Actavis Pharma, Inc.

2. I make this certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' *Daubert* Motion to Exclude Testimony of Punam Keller, Ph.D. ("Defendants' Opposition").

3. Exhibit A to Defendants' Opposition is a true and accurate copy of the *curriculum vitae* of Punam A. Keller, Ph.D.

4. Exhibit B to Defendants' Opposition is a true and accurate copy of the transcript of the March 10, 2022 deposition of Defense Expert Punam Keller. This document has been filed with redactions to the extent it contains information

that has been designated as “PROTECTED INFORMATION” as defined in the Amended Confidentiality and Protective Order [ECF No. 1661] (the “Protective Order”).

5. Exhibit C to Defendants’ Opposition is a true and accurate copy of an excerpt from the December 3, 2021 deposition of Plaintiff Samuel Cisneros. This document has been filed under seal as it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: June 2, 2022

Respectfully submitted,

/s/ Tiffany M. Andras

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Actavis Pharma, Inc.*

CERTIFICATE OF SERVICE

I, Tiffany M. Andras, an attorney, hereby certify that on June 2, 2022, I caused the foregoing Certification of Tiffany M. Andras to be served on all counsel of record via the Court's electronic filing service ("ECF").

By: /s/ Tiffany M. Andras